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NORMAN R. RIDGELL CLERK
KING COUNTY WASH

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

BERT STAHES, et al,

Plaintiffs,

vs.

MAURIE PALMBERG, et al,

Defendants.

No. 367315

ANSWER

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KING COUNTY WASH

and the community consisting of himself and his wife, Annie Stangroom, came now the defendants, Stuart L. Stangroom and J.A. Zengel, individually and as Administrator of estate of Elizabeth Zengel, deceased, in the above entitled action and in answer to the complaint of the plaintiffs, admit, deny and allege as follows:

I.

Admit that the parties herein, with the exception of Stuart L. Stangroom, are joint owners of the following described property in King County, Washington:

"Those portions of Government Lots 1, 2 and 3 of section 20, Township 25 North, Range 6 E.W.N., described as follows:

PARCEL "A"

Beginning at a point on the North line of said Government Lot 1, 650 feet East of the Northwest corner thereof; thence South 900 feet; thence Southwesterly, at right angles to the right-of-way of the Northern Pacific Railway Company (formerly the Seattle and International Railway) to the Northeast corner of said right-of-way; thence Southeasterly, along said Northeast line to the South line of said Government Lot 1; thence East, along said South line to the Southeast corner thereof; thence North, along the East line thereof, to the Northeast corner thereof; thence West, along the North line, to the point of beginning, EXCEPT County Road.

PARCEL "C"

Beginning at the Southeast corner of said Government Lot 2; thence North, along the East line thereof, 110 feet; thence West 90 feet to the

WILLIAM W. SCHMIDT
ATTORNEY AT LAW
1401 4th Avenue
Seattle
District 1, Wash.
Main 6555

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Northeasterly line of the right-of-way of the Northern Pacific Railway Company (formerly the Seattle and International Railway); thence Southeasterly, along said Northeasterly line, to the point of beginning, TOGETHER WITH second class shore lands adjoining, EXCEPT county Road."

and the second class shore lands adjoining and butting Parcels "B" and "C".

Defendants, Stuart L. Stangroom and J.A. Zengel, individually and as Administrator of estate of Elizabeth Zengel, deceased, deny that the parties herein are joint owners of the following described property in King County, Washington:

"Those portions of Government Lots 1, 2 and 3 of Section 20, Township 25 North, Range 6 E.W.N., described as follows:

PARCEL "B"

"Beginning at the Northeast corner of said Government Lot 2; thence South, along the East line thereof, 569.64 feet; thence West 211.58 feet; thence Southwesterly, at right angles to the right-of-way of the Northern Pacific Railway Company (formerly the Seattle and International Railway), 15.3 feet, to the Northeasterly line of said right-of-way; thence Northwesterly, along said Northeasterly line, to the North line of said Government Lot 2; thence East, along said North line, to the point of beginning, TOGETHER WITH second class shore lands adjoining, except County Road.

II.

Admit the allegations contained in Paragraph II of the said complaint.

III.

Deny the allegations contained in Paragraph III of the said complaint.

Further answering said complaint and by way of AFFIRMATIVE DEFENSE, defendants Stuart L. Stangroom and J.A. Zengel, individually and as Administrator of estate of Elizabeth Zengel, deceased, in the above entitled action and in answer to the complaint of the plaintiffs, alleges:

I.

That the following described real property situated in King County, Washington, is the community property of the Defendants, Annie Stangroom and Stuart L. Stangroom, her husband, and that none of the other parties herein have any interest whatever in the following described real property situated


in King County, Washington:

"those portions of Government Lots 1, 2 and 3 of Section 20, Township 25 North, Range 6 E.W.M., described as follows:

PARCEL "B"

Beginning at the Northeast corner of said Government Lot 2; thence South, along the East line thereof, 569.34 feet; thence West 221.58 feet; thence Southwesterly, at right angles to the right-of-way of the Northern Pacific Railway Company (formerly the Seattle and International Railway; 15.3 feet, to the Northeasterly line of said right-of-way; thence Northwesterly, along said Northeasterly line, to the North line of said Government Lot 2; thence East, along said North line, to the point of beginning, TOGETHER WITH second class shore lands adjoining, EXCEPT County Road.

WHEREFORE, the defendants having fully answered the plaintiff's Complaint, defendants pray that the plaintiffs recover nothing thereby, and that the defendants have and recover from the plaintiff their costs and disbursements herein to be taxed.


PHILIP W. SCHOEL, Attorney for
defendants Stuart L. Stangroom
and J.A. Zengel, individually and
as Administrator of estate of
Elizabeth Zengel, deceased.

STATE OF WASHINGTON)
(ss.
COUNTY OF KING)

PHILIP W. SCHMEL, being first duly sworn on oath deposes and says and the community consisting of himself and his wife, Anne C. Schmelt, that he is the attorney for defendants Scher, L. Stangroom and J.S. Zengel individually and as administrator of estate of Elizabeth Zengel, deceased; that he has read the foregoing Answer, knows the contents thereof, believes the same to be true and that all the material allegations of this Answer are within the personal knowledge of Philip W. Schmelt.

SUBSCRIBED and SWORN to before me this 11th day of February, 1946.

COPY RECEIVED

DATE Feb 11-1946

FIRM W. C. Brown
BY Stanley C. Brown

NOTARY PUBLIC in and for the State
of Washington, residing at Seattle